

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KITCHEN WINNERS NY INC.,

Plaintiff,

v.

ROCK FINTEK LLC,

Defendant,

Civil Action No. 22-cv-05276-PAE

ROCK FINTEK LLC,

Counterclaim and Third-
Party Plaintiff,

v.

KITCHEN WINNERS NY INC,

Counterclaim Defendant,

and

ADORAMA INC., HERSHEY WEINER,
JOSEPH MENDLOWITZ, JNS CAPITAL
HOLDINGS LLC and JOEL STERN,

Third-Party Defendants.

ROCK FINTEK LLC'S INITIAL DISCLOSURES

Defendant and Counterclaim-Plaintiff Rock Fintek LLC, by and through their undersigned counsel, make the following initial disclosures pursuant to Fed. R. Civ. P. 26(a), based on information reasonably available at present. Rock Fintek reserves the right to supplement these disclosures as discovery continues.

I. Fed. R. Civ. P. 26(a)(1)(A)(i) – Individuals with Discoverable Information

Name	Contact Information	Subject Matter
Thomas Kato	c/o undersigned counsel	The transactions at issue; defects in and non-conforming nature of the gloves; damages sustained by Rock Fintek.
Bradley Gilling	c/o undersigned counsel	The transactions at issue; defects in and non-conforming nature of the gloves; damages sustained by Rock Fintek.
Alex King (Dimerco Logistics)	Alexander King Branch Manager Dimerco Express (U.S.A.) Corp (DIMNYC) 1-516-279-1342 Alexander.King@dimerco.com	Shipping and proofs of delivery for the gloves at issue; correspondence with Adorama parties and JNS parties regarding same.
Ascension Health	c/o outside Counsel: Winthrop B. Reed, III WReed@lewisrice.com 600 Washington Avenue Suite 2500 St. Louis, Missouri 63101-1311 314.444.7617 (direct) 314.612.7617 (fax)	The transactions between Rock Fintek and Ascension; defects in and non-conforming nature of the gloves; damages sustained by Rock Fintek; storage of the gloves; mitigation efforts.
Medline, Inc.	c/o inside counsel: Katherine Morgan 224-327-9271 kmorgan@medline.com	Receiving shipments of gloves sold by Rock Fintek to Ascension; defects in and non-conforming nature of the gloves; storage of the gloves; inventory count of the gloves, including to identify “protection” versus “examination” gloves.
Joseph Mendlowitz	c/o Adorama counsel	Transactions between parties; the source and nature of the gloves at issue; corporate structure

		of Adorama and Kitchen Winners; communications with Joel Stern/JNS.
Joel Stern	c/o his counsel	Transactions between parties; the source and nature of the gloves at issue; communications with Adorama/Kitchen Winners.
Hershey Weiner	c/o Adorama counsel	Transactions between parties; the identity and nature of the gloves at issue; extortionate demands alleged in Rock Fintek's complaint; corporate structure of Adorama and Kitchen Winners; communications with Joel Stern/JNS.
Mendel Baron	c/o Adorama counsel	Transactions between parties; the identity and nature of the gloves at issue; extortionate demands alleged in Rock Fintek's complaint; corporate structure of Adorama and Kitchen Winners; communications with Joel Stern/JNS.
Estern Banon	Unknown	LevMed gloves.
Arik Maimon	c/o his counsel: Gary M. Murphree, Esq. 10743 SW 104TH St. MIAMI, FL 33176 P: 305.441.9530 F: 305.595.5086	Transactions between parties; the sources and nature of the gloves at issue; extortionate demands alleged in Rock Fintek's complaint.
Chunrong Li	5 Awbury Road Philadelphia, PA 19138	The source and nature of some of the gloves at issue.
Anna Grinvald	Global Tooling Service +86-13622617084 +8676923326470 Dongguan, China	Transactions between parties; sources and nature of the gloves at issue.

II. Fed. R. Civ. P. 26(a)(1)(A)(ii) – Documents in Rock Fintek Possession or Control

- Email correspondence between the parties
- WhatsApp chat communications between the parties
- Email and WhatsApp communications with third-parties regarding the gloves and transactions at issue
- Photographs and videos of gloves at Medline warehouses
- Testing reports regarding the gloves at issue

III. Fed. R. Civ. P. 26(a)(1)(A)(iii) – Computation of Damages

At this stage in the litigation, Rock Fintek is unable to calculate its damages and reserves the right to assess damages at a later stage once discovery has progressed.

IV. Fed. R. Civ. P. 26(a)(1)(A)(iv) – Insurance Policies

Rock Fintek is unaware of any applicable insurance policies.

V. Fed. R. Civ. P. 26(a)(2) – Expert Testimony

Rock Fintek has not retained any expert witnesses at this time, but reserves the right to do so in accordance with the applicable rules and any future scheduling orders issued by the Court.

May 15, 2023

Respectfully submitted,
ROCK FINTEK LLC
By its attorneys,

/s/Phillip Rakhunov
Phillip Rakhunov
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Certificate of Service

The undersigned certifies that this document will be electronically served on counsel who are registered users of ECF on May 15, 2023.

/s/Phillip Rakhunov